



Telecommunications for the Deaf & Hard of Hearing, Inc.
8630 Fenton Street, Suite 121, Silver Spring, MD 20910-3803
Video: 301-563-9112; Fax: 301-589-3797
Email: cstout@tdiforaccess.org; Web: www.tdiforaccess.org

April 12, 2013

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: WT Docket No. 11-49

Dear Chairman Genachowski,

This joint letter of support comes from a coalition of national consumer advocacy organizations of, for, and by the deaf and hard of hearing, and a technology access research program with Gallaudet University. The coalition consists of: Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), National Association of the Deaf (NAD), Association of Late-Deafened Adults (ALDA), Cerebral Palsy and Deaf Organization (CPADO), American Association of the Deaf-Blind (AADB), California Coalition of Agencies Serving Deaf and Hard of Hearing (CCASDHH), and Technology Access Program at Gallaudet University (TAP), collectively known as “Consumer Groups and TAP.”

Ensuring reliable access to emergency services is a major concern for Consumer Groups and TAP, and improved location identification technology has the ability to dramatically increase the effectiveness of 9-1-1 for Americans who are deaf, deaf-blind, hard of hearing, late-deafened, or deaf with a mobile disability as well as for others who make emergency calls over voice and text. Consumer Groups and TAP strongly encourage the Commission to take action on the request of Progeny LMS, LLC for authority to offer position location services to improve the effectiveness of 9-1-1 location accuracy.

Accurate location information is a critical element in 9-1-1 response, and the need to locate 911 callers is even more acute in the case of TTY and text-to-911 “callers” who may be unable to provide their location with the speed or accuracy of traditional voice callers. As we explained in our recent filing in the NG-9-1-1 proceeding, text-to-911 will provide a valuable service, but it is

critical that once implemented, it be able to meet customers' expectations and the needs of emergency response personnel.¹ In particular, Consumer Groups and TAP believe that the Commission should ensure that consumers are aware of the limitations of current wireless device location technologies, and should also ensure that it is doing its utmost to facilitate the development and deployment of technologies that can solve this shortcoming.

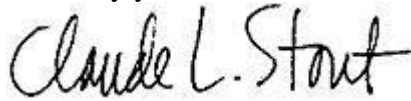
A primary limitation of current generation location technology is that it is often unable to accurately locate callers indoors, especially in a multi-story buildings. This shortcoming increases when the size of buildings grow; even when a general street location can be obtained from GPS or from the caller, this information is far from sufficient for callers located in large buildings such as offices, apartments, and hotels because the floor locations are not conveyed.

Consumer Groups and TAP understand that Progeny LMS, LLC and its parent company, NextNav Holdings, LLC (Progeny/NextNav), have developed a next-generation location identification service that may provide an answer to the limitations of existing location identification technologies. We have met with the representatives of Progeny and NextNav and we find the potential capabilities of the service that they are developing very compelling. They have explained to us that they have demonstrated in recent testing that their service can provide highly accurate location information even for wireless callers that are, for example, deep inside a large office facility or on a top floor of a ten story apartment building. Accurate information like this could significantly improve the value of 9-1-1 service for Americans who are deaf and hard of hearing, and other text-to-911 callers. It is also our understanding that the NextNav technology, since it is a handset-based location technology which supplements current GPS signals, provides the consumer greater control over his or her own location information and provides greater privacy protections than network-based location technologies. These features are of great benefit.

Consumer Groups and TAP also understand that as a condition of its licenses to use the 902-928 MHz band, Progeny must receive authorization from the Commission before it can begin offering its location service on a commercial basis. Because of the importance of improved location service to Americans who are deaf and hard of hearing, and to the effectiveness of the 9-1-1 system as a whole, Consumer Groups and TAP encourage the Commission to promptly complete its review of the spectrum sharing studies that have been conducted on Progeny's service and to authorize Progeny to begin providing E911 location services to the public and to emergency first responders as quickly as possible. Last, but not least, the Commission should adopt rules that encourage the provision of indoor position location services by multiple providers of such services and enlist the support of wireless carriers to promptly incorporate such capabilities into their networks.

¹ Telecommunications for the Deaf and Hard of Hearing, Inc., Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications, PS Docket No. 11-153; Framework for Next Generation 911 Deployment, PS Docket No. 10-255 (filed Jan. 29, 2013).

Sincerely yours,



Claude L. Stout
Executive Director
Telecommunications for the Deaf
& Hard of Hearing

Cheryl Heppner
Vice Chair
Deaf & Hard of Hearing Consumer
Advocacy Network

Dr. Christian Vogler
Director, Technology Access Program
Gallaudet University

Sheri Farinha
Vice Chair
California Coalition of Agencies
Serving the Deaf and Hard of Hearing

Andrew Phillips
Policy Attorney
National Association of the Deaf

Randall Pope
President-Elect
American Association of the Deaf-
Blind

Brenda Estes
Past President
Association of Late-Deafened Adults

Mark Hill
President
Cerebral Palsy & Deaf Organization

cc: Commissioner Robert McDowell, Federal Communications Commission
Commissioner Mignon Clyburn, Federal Communications Commission
Commissioner Jessica Rosenworcel, Federal Communications Commission
Commissioner Ajit Pai, Federal Communications Commission
Ruth Milkman, Chief, Wireless Telecommunications Bureau, FCC
Kris Monteith, Acting Chief, Consumer & Government Affairs Bureau, FCC
Karen Peltz-Strauss, Deputy Chief, Consumer & Government Affairs Bureau, FCC
Greg Hlibok, Chief, Disability Rights Office, Consumer & Gov't Affairs Bureau, FCC